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	RULES ON REPORTING IRREGULARITIES	Release: 1
		page/pages: 1 / 11

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In accordance with and on the basis of the provisions of the Act establishing the limited liability company Steklarna Hrastnik d.o.o., the Act establishing the company Glashuta d.o.o., the Articles of Association establishing the company RC eNeM d.o.o. and the Agreement on the manner of exercising mutual rights and obligations and the Agreement on management and management in the implementation of the project RC eNeM d.o.o., the Employment Relations Act (ZDR-1; UL RS No. 12/13, with all amendments) and Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting violations of Union law, the

RULES ON REPORTING IRREGULARITIES

is hereby accepted

1. PURPOSE, SCOPE, REPORTING

The Rules on the Reporting of Irregularities (hereinafter: the Rules) shall apply mutatis mutandis to Steklarna Hrastnik d.o.o., for the subsidiary Glashuta d.o.o. and the subsidiary RC eNeM d.o.o. - Branch 3.

Hereinafter, the term »Company« or »Employer« shall be used jointly for all companies, insofar as the individual provision does not refer to a specific company, which is mentioned independently at the time, such as Steklarna Hrastnik or Glashuta or RC eNeM – Branch Office 3.

The terms used in the Rules written in male grammatical form are also used as neutral terms for female grammatical form.

THE PURPOSE of adopting the Rules is to:

- encourage employees and all stakeholders to conduct themselves responsibly, fairly, ethically and transparently;
- establish a system of notification of infringements through independent and independent reporting lines
- establish channels and procedures for internal reporting of infringements
- establish procedures for receiving and monitoring reports of infringements.
- ensure that any infringement or suspected infringement or irregularity is reported, as this is in the interest of the Company itself;
- promote the ethical conduct and functioning of all stakeholders in the work and business process in employers, encouraging and ensuring legal compliance, honesty, credibility and the enforcement of core values: PURITY – PASSION – HEART.

SCOPE (WHAT IRREGULARITIES CAN BE REPORTED):

The following may be reported:

- violations of laws, regulations and administrative provisions,
- breaches of contracts,
- violations of procedures, ethical and moral principles,
- acting or acting contrary to the Company's policy and its internal rules,
- endangering human health and safety,
- mobbing,
- fraud and fraud.

PERSONAL SCOPE (WHO CAN FILE A REPORT)

The report can be submitted by regular employees of the Employer (for a definite or indefinite period), contract workers (company, copyright or other civil law contract), schoolchildren (pupils, students), jobseekers, trainees, suppliers and customers.

REPORTING

The Ethics Committee and on its behalf the Head of Internal Audit shall report to the management on the reports made and the results of the investigations on a half-yearly basis.

The ethics committee shall report to the founder of each company on any controversial behaviour of the management.

FUNDAMENTAL PRINCIPLES IN THE CONDUCT OF THE WHISTLEBLOWING PROCEDURE

CONFIDENTIAL TREATMENT OF WHISTLEBLOWING REPORTS

Reports shall be handled seriously, responsibly and in strict confidence. The identity of the reporting person shall be strictly protected, except in specific circumstances, such as criminal investigations, when the identity of the reporting person may be disclosed to the responsible institutions – the competent authorities that take over the resolution of the case; however, the reporting person must be informed in advance. Access to the mailbox is granted exclusively to members of the ethics committee. All communications and documentation are stored in e-format on directory X: folder 29-Compliance of operations subfolder WHISTLEBLOWING, with limited access, exclusively to members of the ethics committee.

PROTECTION OF A BONA FIDE REPORTING PERSON

The Employer ensures that a reporting person who submits a report of an infringement / irregularity in good faith shall be protected from discrimination and unfair or retaliatory treatment. A report of an infringement made on the basis of a reasonable presumption by the reporting person that the information is true shall not result in a disciplinary sanction against him/her, even if it is subsequently established that there has been no infringement, any other proceedings or retaliation, harassment, intimidation, harassment.

The Employer guarantees to protect the reporting person if the cumulative disclosure meets the following conditions:

- disclosure must be made in good faith
- the reporting person must reasonably consider the information disclosed to be true
- the purpose of disclosure must not be for the personal benefit of the reporting person, his/her friends, acquaintances or family.

If the reporting person makes a disclosure against himself/herself or admits that he/she has committed an abuse, the Employer cannot guarantee that he/she shall not be investigated and measures taken against him/her in accordance with the legislation and internal acts.

Reports made in bad faith (defamation, malicious accusations, intentionally incorrect information, etc.) are undesirable and may have legal consequences; the reporting person shall be subject to appropriate disciplinary or legal action, in accordance with the applicable legislation and internal acts.

PROTECTION OF DATA

Data shall be processed solely for the purpose of investigating the report of irregularities and eliminating the reported conduct and its consequences. Data may be communicated to external organisations involved in the investigation, if required by law or the legitimate interest of the Company, on the basis of a previously prepared assessment of the legitimate interest by an ethics committee.

The personal data of the reporting person may not be disclosed to any third party, except in cases where it is apparent that key important information provided by the reporting person is untrue and given in bad faith and circumstances are given which indicate that an offence or offense has been committed, or where there is a reasonable suspicion that the reporting person has caused unlawful damage or other violation of the rights of others, his/her personal data may be disclosed to the authority or person entitled to initiate or conduct proceedings. Data processed in an irregularity reporting procedure shall not be transferred to another country or an international organisation.

Without express and voluntary consent, the whistleblower's personal data shall not be disclosed to the public.

2. DEFINITIONS

Good faith: the fact that the reporting person, when preparing or reporting the infringement, genuinely believed that the allegations were true and appeared to be facts that could constitute a criminal offence or violation of regulations (legal and internal) or ethical, moral principles, which is why the reporting person cannot be accused of wanting to harm others or of acting maliciously, unfairly or for personal gain and had reasonable grounds to believe that the facts reported were true.

The Ethics Committee (hereinafter: the Committee): the committee appointed by the Company's management – the CEO/Director, which is responsible for addressing the reported violations, proposing measures to prevent further violations and proposing measures against the identified / potential violators. The Board consists of four members, namely: Head of Internal Audit; Director of Human Resources and General Affairs; President of the Trade Union, Head of Legal Affairs, who is also responsible for the administration of applications, procedures and reports.

The Committee operates in accordance with ethical and moral norms, professionally and impartially, taking into account the applicable legislation (legal provisions on the protection of personal data, confidential data, etc.).

Internal acts: Regulations, instructions, rules, management decisions (resolutions, orders), collective agreements (general, sectoral or corporate).

Personal data: any information relating to an identified or identifiable individual.

Report on irregularities or violations: report on ethical violations and report on violations of legislation, other regulations and internal acts.

Management: General Director or Director or Procurator of an individual employer.

Disputed practices – irregularities - infringements: actual or potential infringement of the provisions of legislation, the Code of Ethics, internal rules/procedures/collective agreements, as well as all acts that could cause serious damage to the Company or workers, such as but not limited to:

- violations of laws, regulations and administrative provisions,
- breaches of contracts,
- operations which are contrary to the Employer's policy and internal acts of the Employer,
- unethical operation or illicit, bad business practices,
- environmental endangerment,
- endangering human health and safety,
- deception and fraud,
- corruption,
- harassment,
- discrimination.

Whistleblower: a person who submits a report in good faith on irregularities – controversial practices (may also be a reporting person).

3. PROCEDURE OF REPORTING

3.1 Methods of reporting irregularities

Reports of irregularities may be submitted orally and in writing. Written reports shall be submitted on the form that forms an integral part of these Rules (Form PN-01) and accessible at the back of the Rules.

The form is also available on the STEKLARNA HRASNİK portal, on the website www.hrastnik1860.com and from the members of the committee.

The use of the form is recommended, but not mandatory.

Oral reports of irregularities may be submitted in person, during the working hours of the Employer, to any member of the committee. A member of the Board shall make a record of the report with the essential information necessary to deal with the reported irregularity or fill in the form for reporting the irregularity (Form PN-01).

A written report of irregularities may be submitted to:

a) via the intranet portal: <https://steklarna1860si.sharepoint.com/sites/Dom>

b) via website www.hrastnik1860.com.

c) via email at povej@hrastnik1860.com, to which all members of the Board have access.

d) by submitting the report to the Company's mailboxes for opinions, compliments and comments, to which the members of the Committee have access; the marked mailboxes are installed:

(i) at the Vitrum's location – the main entrance to the factory and in the hallway in front of the entrance to the restaurant (2nd floor of the administrative building);

(ii) at the Special's location – in front of the entrance to the dining room.

e) by regular mail, addressed to the *Ethics Committee* (Steklarna Hrastnik d.o.o., Cesta 1. maja 14, 1430 Hrastnik); with the inscription "SAY _ do not open".

Reporting violations / irregularities can also be anonymous.

3.2 Receipt and registration of a report of irregularities

Employers encourage all well-intentioned reports of irregularities.

In cases where it is apparent that the key important information provided by the reporting person is untrue and not given in good faith, and where there is a reasonable suspicion that the reporting person had the intention to cause, or has caused, or is likely to cause, unlawful damage or other infringement of the rights of others, action may be taken against the reporting person on the basis of labour, criminal or misdemeanour legislation, and his/her personal data shall be disclosed to the authority or person entitled to initiate or conduct such proceedings.

Reports of irregularities submitted orally or in writing shall be securely stored by the Ethics Committee administrator (in hard copy, in a case protected from unauthorised access) and in scanned or e-format on directory X: folder 29-Compliance of operations subfolder WHISTLEBLOWING to which the members of the Ethics Committee have access.

The administrator keeps records of reports of irregularities / violations (Form EVIDENCA PN) with the following data:

a) date of the infringement report / date of notification,

b) a brief description of the report of irregularities / reports (without providing personal data),

c) whistleblower tag (without providing personal data, e.g. employee, supplier/business partner, customer, other, unknown/anonymous),

d) a decision,

e) measures taken, consequences.

3.3 Consideration of reports of irregularities

Upon receipt of the report, the administrator shall convene a committee for the purpose of examining the report and prior classification of the report by type of irregularity.

The Board shall inform the reporting person at the home address or address specified in the report (may also be e-mail address) about the receipt of the report within 7 days.

If necessary, the Committee shall invite the reporting person to complete the report, to provide additional explanations, to provide any documentation or the like.

The deadline for the examination and decision of the Board on the report shall be 30 (thirty) days from its receipt.

Derogation from this period shall be possible only in justified cases and on condition that the reporting person is also informed at the same time, unless a report of irregularities has been made anonymously.

The extension of the 30 (thirty) day deadline shall be decided by the Committee, and the investigation shall not take longer than 3 (three) months.

3.3.1 First instance procedure - investigation of the report / irregularities

MANAGING THE PROCEDURE:

The Committee shall record all decisions and all procedures, measures in writing (minutes on the conduct of proceedings).

The Committee shall sit and act with a minimum of three members.

In the event of an infringement affecting one or more members of the Committee or its field of activity, that member of the Committee shall be excluded from the examination and decision on the irregularity. The Committee shall act in a reduced composition, but not less than three members. If, as a result of the exclusion rule referred to above, it is not possible to ensure at least a 3-member composition of the Board, the General Manager may, by decision in this case, temporarily appoint new members of the Board from among the Directors of the Sectors.

CONSIDERATION OF THE REPORT AND THE TYPE OF DECISIONS OF THE COMMITTEE depending on the content and severity of the irregularities or contentious practices reported may be as follows:

- the report shall be resolved by agreement, without investigation,
- the investigation shall be carried out internally,
- the investigation shall be carried out in cooperation or by external competent authorities / services (police, law enforcement authorities, potential external experts).

In order to establish the factual situation or to determine the circumstances of the report, the Committee shall have the possibility to include in the procedure and request an opinion / position, access to data or participation in the procedure of any competent sector (field or department) or employee (regardless of the status or legal position).

If the report of irregularities relates to a violation that could result in an extraordinary termination of the employment contract by the Employer, or a regular termination of the employment contract due to a culpable reason on the part of the employee, the employee's immediate superior shall be informed about the violation after the termination of the procedure.

All documents, e.g. materials provided by the reporting person or produced or obtained during the investigation process, shall be of a confidential nature and shall be made available exclusively to the Board and solely for the purpose of the investigation of the irregularities.

INFORMATION AT THE INITIATION OF THE PROCEDURE: Upon initiation of an investigation, the Committee shall inform the person concerned (the person concerned) of:

- the filing of a report of irregularities relating to it (taking into account the protection of the anonymity of the reporting person);
- the fact that, in order to ensure a fair procedure, the person concerned may, directly or through his/her legal representative, state his/her position on the report of irregularities and provide appropriate evidence.

In exceptional and justified cases, the person concerned may be informed at a later date; this shall apply in particular where immediate information could jeopardise the evidence, lead to an influence on witnesses or is likely to render the investigation of an irregularity report impossible, seriously compromised or prevented.

In the case of:

- where the reporting person does not provide sufficient information for the conduct of the investigation or contact details to enable the Board to request additional information strictly necessary for the initiation or successful conduct of the investigation which cannot be obtained from another source or which would be subject to disproportionate difficulties; and/or
- it is impossible to obtain sufficient and/or appropriate information to investigate the content of the report in order to carry out an investigation;

the Board may decide to terminate the investigation without taking a final decision.

THE DECISION to close the investigation shall be taken by the Committee taking into account and/or on the basis of the opinion or position of the Director of the competent professional sector taking part in the investigation of the case and on the basis of the information, opinions, positions and documents obtained in the course of the investigation.

The Committee shall take a decision which may establish that:

- there has been no contentious conduct – irregularities – infringement, or
- there has been a controversial conduct – irregularities – infringement.

PROCESS WAIVER

The Committee may decide to suspend the proceedings in the event that the irregularity has been repeatedly reported with the content and by the same reporting person, or in other justified cases, such as where the report is made anonymously and the reporting person has not sufficiently specified the alleged infringement or has sufficiently specified against whom it is submitted, which prevents the investigation.

In such cases, the investigation or the procedure for detecting irregularities may be dispensed with. The decision on the suspension and the reasons for the suspension of the investigation shall be recorded by the committee and the whistleblower shall, unless he/she is anonymous, be informed of the suspension.

The Committee may send the results of the investigation (with the investigation documentation), together with a proposal on corrective measures and/or a proposal for action against the offender, to the manager (CEO/director/procurator) who shall take the final decision (in terms of further e.g. labour, civil and/or criminal proceedings).

The final decision must be notified to the Board by the manager.

After this notification, the Committee shall inform the reporting person and the person concerned (the person to whom the report relates) in writing of the results of the investigation and of the measures taken.

The reporting person shall be informed at the home address or address specified in the report (also e-mail address).

3.3.2 The second instance process

If the reporting person or the person concerned (the person to whom the report relates) disagrees with the outcome of the investigation carried out in connection with the report of irregularities (first instance proceedings), he/she may submit the case for reassessment and decision to the management of the Company, which shall further examine the case and take a decision to:

- there has been no contentious conduct – irregularities – infringement, or
- there has been a controversial conduct – irregularities – infringement.

The reporting person shall forward the reasoned request for reassessment to the committee, which shall forward the report to the management without delay.

The manager, as a second instance body, must consider and decide on the request for reassessment as soon as possible.

Insofar as the request for reassessment relates to management, the request for reassessment shall be reviewed and further verified by the Board, as well as a final decision.

4. TRANSITIONAL AND FINAL PROVISIONS

Interpretation of the Rules

The legal department of the Employer is responsible for the interpretation of the provisions of these Rules and for clarifying the procedures for reporting irregularities.

Validity of the Rules

The Rules with attachments are adopted by the Managing Director of Steklarna Hrastnik/ Director of Glashuta/ Procurator of Branch 3, after prior notification of the trade union to the employers, in accordance with the relevant legislation.

The Rules shall enter into force on the date of publication.

The Rules shall be published in the usual manner in the companies and shall be kept in the legal service of Steklarna Hrastnik, and the employees shall have the opportunity to consult the Rules throughout its validity in the human resources service of Steklarna Hrastnik.

Hrastnik, 01.02.2022

GLASHUTA d.o.o.
General Manager
Magdalena ŠURINA,

STEKLARNA HRASTNIK d.o.o.
General Manager
MSc. Peter ČAS

RC eNeM d.o.o., Branch Office 3
Procurator
Tilen SEVER

EXPLANATION: The original language of the Policy is Slovenian. Slovenian version of the Policy is formally signed and shall prevail above English version.

FORM FOR REPORTING IRREGULARITIES

PERSONAL DATA PROTECTION: The user of the system of reporting irregularities "SAY" allows the use and processing of personal data and other data for the purpose of the operation of the system and procedures for reporting irregularities. The Employer, as the data controller, undertakes to use the data solely for the purpose for which it was obtained. The reporting person agrees with the submitted form that he/she is familiar with the handling of personal data and agrees that the Employer processes and stores his personal data for 3 years or until its cancellation. The Employer shall treat and process personal data in accordance with the Personal Data Protection Act and the General Data Protection Regulation.

I WOULD LIKE MY REPORT TO BE HANDLED ANONYMOUSLY <small>In the event that the selection is not marked, the report shall be handled anonymously, personal data shall only be known to the ethics committee; for further processing they will be anonymized)</small>	YES	NO
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REPORTING PERSON'S PERSONAL DATA

NAME AND SURNAME	
Address	
E-mail	
Telephone number	

INFORMATION ON THE IRREGULARITY OR DESCRIPTION OF THE IRREGULARITY TO BE REPORTED - The questions below will help you to describe the controversial conduct. Please answer the questions briefly but accurately (and as perfectly as possible) and **YOU CAN ALSO USE THE FOLLOWING PAGE OF THE FORM FOR ANSWERS.**

1. WHAT HAPPENED?
2. WHO COMMITTED THE IRREGULARITY? Indicate the name and surname of the unit and organization (if known)
3. WHEN DID THE IRREGULARITY OCCUR / WHEN DID YOU NOTICE THIS?
4. WHERE DID IT HAPPEN?
5. IS THERE ANY EVIDENCE OF IRREGULARITY?
6. IS THERE ANYONE ELSE INVOLVED IN THE IRREGULARITY BESIDES THE OFFENDER YOU ARE REPORTING?
7. ARE THERE ANY WITNESSES TO THE IRREGULARITIES? Add Witness Contact Information
8. ANY ADDITIONAL RELEVANT INFORMATION

Date: _____

Signature: _____

